

**IN THE UNITED STATES DISTRICT COURT  
FOR EASTERN DISTRICT OF PENNSYLVANIA**

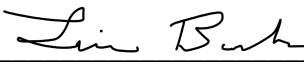
THE MIDDLE EAST FORUM	:	CIVIL ACTION
	:	
	:	NO. 2:19-cv-05697-JS
Plaintiff,	:	
v.	:	
	:	
LISA REYNOLDS-BARBOUNIS	:	
	:	
Defendant.	:	
	:	

**DECLARATION OF LISA REYNOLDS-BARBOUNIS**

I Lisa Reynolds-Barbounis who resides at 1820 Kilbourne Place, Northwest, Washington D.C. 20010, in the United States of America do hereby make OATH and say at follows:

1. My name is Lisa Reynolds-Barbounis.
2. Today is February 15, 2021.
3. Pursuant to the Court's February 3, 2021, Order, I through counsel have contacted Cornerstone to discuss with Cornerstone any outstanding issues regarding e-discovery.
4. I had a Wicker account years ago and I cannot recall the last time I used the account.
5. I do not know the username or pass-code to access this previously used Wickr account.
6. As instructed by the Court I will assist Cornerstone in an alternative data collection method for the Wickr account, however, I have discussed this with Cornerstone previously and it is my understanding that they cannot access the Wickr account and that there is no alternative data collection method. If Cornerstone informs me otherwise, I will cooperate with the alternative data collection method as Ordered by the Court.
7. It is my understanding that there is no password reset function for a Wicker account.
8. I have previously filed a Declaration confirming that I do not have a Wickr account.

9. This Declaration is filed to clarify that I did have a Wickr account in the past, however, I have not used or accessed the account in a very long time and I no longer have access to this old account.
10. Even if the information in my Wickr account could be accessed it would contain no information that is relevant to this case. I did not use the Wickr account to communicate with any third parties about MEF information.
11. I swear under penalty of perjury that the foregoing is accurate, true and correct.

Signature of Declarant: 

Name of Declarant: Lisa Barbounis

Date: February 15, 2021

# **Exhibit A**